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Attorneys for Plaintiff  
ST. PAUL MERCURY INSURANCE COMPANY

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION**

ST. PAUL MERCURY INSURANCE  
COMPANY, a Minnesota corporation

Plaintiff,

v.

AMERICAN SAFETY INDEMNITY  
COMPANY, an Oklahoma corporation;  
CENTURY SURETY COMPANY, an Ohio  
corporation; CHARTIS SPECIALTY  
INSURANCE COMPANY, an Illinois  
corporation; CLARENDON AMERICA  
INSURANCE COMPANY, New Jersey  
corporation; FIRST MERCURY  
INSURANCE COMPANY; an Illinois  
corporation; GEMINI INSURANCE  
COMPANY, a Delaware corporation;  
GRANITE STATE INSURANCE  
COMPANY, a Pennsylvania corporation;  
GREAT AMERICAN INSURANCE  
COMPANY, an Ohio corporation;  
HARTFORD CASUALTY INSURANCE  
COMPANY, an Indiana corporation;  
INTERSTATE FIRE & CASUALTY  
COMPANY, an Illinois corporation;  
IRONSHORE SPECIALTY INSURANCE  
COMPANY, an Arizona corporation;

Case No. 12-CV-05952-LHK-HRL

**STIPULATION GRANTING DEFENDANT  
CENTURY SURETY COMPANY A  
FOURTH EXTENSION OF TIME TO  
RESPOND TO THE COMPLAINT**

Trial: None

CASE NO. 12-cv-05952-LHK-HRL

STIPULATION GRANTING DEFENDANT CENTURY SURETY COMPANY A FOURTH  
EXTENSION OF TIME TO RESPOND TO THE COMPLAINT


1 LEXINGTON INSURANCE COMPANY, a  
 2 Delaware corporation; NATIONAL UNION  
 3 FIRE INSURANCE COMPANY, a  
 4 Pennsylvania corporation; NATIONAL FIRE  
 5 & MARINES INSURANCE COMPANY, a  
 6 Nebraska corporation; NAVIGATORS  
 7 INSURANCE COMPANY; a New York  
 8 corporation; NIC INSURANCE COMPANY,  
 9 a New York corporation; NORTH  
 10 AMERICAN CAPACITY INSURANCE  
 11 COMPANY, a New Hampshire corporation;  
 12 OLD REPUBLIC INSURANCE COMPANY,  
 13 a Pennsylvania corporation; PRAETORIAN  
 14 INSURANCE COMPANY, a Pennsylvania  
 15 corporation; ROCKHILL INSURANCE  
 16 COMPANY, an Arizona corporation;  
 17 VALLEY FORGE INSURANCE  
 18 COMPANY, a Pennsylvania corporation;  
 19 VIRGINIA SURETY COMPANY, an Illinois  
 20 corporation; and Does 1-10, inclusive

21 Defendants.

22 Pursuant to Local Rule 6.1, Plaintiff, St. Paul Mercury Insurance Company hereby  
 23 stipulates that Defendant Century Surety Company may have a fourth extension of time  
 24 within which to respond to the Complaint on file up to and including Monday, March 4,  
 25 2013 to allow the parties further time to discuss informal resolution. This is the fourth and  
 26 will be the final extension of time, following a 28-day extension up to and including January  
 27 31, 2013, a 14-day extension up to and including February 14, 2013, and a 7-day extension  
 28 up to and including February 21, 2013. The parties expect to have this matter resolved  
 shortly and request this final extension to allow for this to be finalized. This extension will  
 not impact any dates scheduled for the case, as the Initial Case Management Conference is  
 currently set for April 4, 2013.


1 Dated: February 21, 2013

THE AGUILERA LAW GROUP, APLC

2   
3 A. Eric Aguilera, Esq.  
4 Daniel Eli, Esq.  
5 Adam A. Wright, Esq.  
6 Attorneys for Plaintiff  
7 ST. PAUL MERCURY INSURANCE COMPANY

8 Dated: February 21, 2013

WOOLLS & PEER  
A Professional Corporation

9   
10 Lisa Darling-Alderton, Esq.  
11 Attorneys for Defendant  
12 CENTURY SURETY COMPANY  
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14 PURSUANT TO STIPULATION, IT IS SO ORDERED

15  
16 DATED 4/02/2013

BY

  
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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 700 S. Flower St., Ste. 3350, Los Angeles, California 90017.

On February 21, 2013, I served the foregoing document described as: **STIPULATION GRANTING DEFENDANT CENTURY SURETY COMPANY A FOURTH EXTENSION OF TIME TO RESPOND TO THE COMPLAINT** on the interested parties in this action.

☐ **BY U.S. MAIL**

( ) \*I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

☐ As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under the practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage date is more than 1 day after date of deposit for mailing in affidavit.

☒ **BY ELECTRONIC SERVICE VIA ECF** I transmitted a true copy of the above entitled document(s) to CM/ECF for filing and service on all parties.

☐ (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on February 21, 2013 at Los Angeles, California.

/s/ Judy Jaramillo

Judy Jaramillo